

1 Beth Wilkinson (*pro hac vice*)
2 Rakesh N. Kilaru (*pro hac vice*)
3 Kieran Gostin (*pro hac vice*)
4 Grace Hill (*pro hac vice*)
5 Anastasia M. Pastan (*pro hac vice*)
6 Jenna Pavelec (*pro hac vice*)
7 WILKINSON STEKLOFF LLP
8 2001 M Street, N.W., 10th Floor
9 Washington, D.C. 20036
10 Telephone: (202) 847-4000
11 Facsimile: (202) 847-4005
12 bwilkinson@wilkinsonstekloff.com
13 rkilaru@wilkinsonstekloff.com
14 kgostin@wilkinsonstekloff.com
15 ghill@wilkinsonstekloff.com
16 apastan@wilkinsonstekloff.com
17 jpavelec@wilkinsonstekloff.com

18 Bambo Obaro (Bar No. 267683)
19 WEIL, GOTSHAL & MANGES LLP
20 201 Redwood Shores Parkway
21 Redwood Shores, CA 94065
22 Telephone: (650) 802-3083
23 Facsimile: (650) 802-3100
24 bambo.obaro@weil.com

25 *Counsel for Microsoft Corporation*

26 [Additional Counsel Identified on Signature Page]

27
28
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

29 FEDERAL TRADE COMMISSION,

Case No. 3:22-cv-02880-JSC

30 Plaintiff,

**CORRECTED ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED (CIVIL L.R. 79-5(f))**

31 v.
32
33 MICROSOFT CORPORATION and
34 ACTIVISION BLIZZARD, INC.,

Date: TBA
Time: TBA
Dept.: Courtroom 8—19th Floor
Judge: Honorable Jacqueline S. Corley

35 Defendants.

1 Pursuant to Civil Local Rules 7-11 and 79-5(f), Defendants Microsoft Corporation and Activision
 2 Blizzard, Inc. (collectively, “Defendants”) respectfully file this Administrative Motion to Consider
 3 Whether Another Party’s Material Should Be Sealed in connection with Defendants’ Memorandum of
 4 Law in Opposition to Motion for Preliminary Injunction (“Opposition”), the Declaration of Beth
 5 Wilkinson in Support of Defendants’ Opposition, and certain supporting exhibits to the Opposition.

6 Certain portions of Defendants’ Opposition contain documents designated by Plaintiff Federal
 7 Trade Commission as well as several non-parties as confidential or highly confidential. Accordingly,
 8 Defendants seek to file under seal the following:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition	Page 3, portions of lines 3-6	Sony
Opposition	Page 3, portions of lines 18-19	Sony
Opposition	Page 3, portions of lines 16-19	Sony
Opposition	Page 6, portions of lines 5-6, footnotes 3 and 4	Sony
Opposition	Page 6, portions of lines 20-21	Sony
Opposition	Page 6, portions of lines 24-25; Page 7, portion of lines 1-3	Sony
Opposition	Page 7, portions of lines 5-6	Sony
Opposition	Page 11, portions of lines 7-10, footnote 7	Sony and Nintendo
Opposition	Page 12, portions of lines 6-7, footnote 9	Sony
Opposition	Page 17, portion of line 11	Sony
Opposition	Page 17, portions of lines 21-22	Sony
Opposition	Page 18, portion of line 1	Sony
Opposition	Page 20, footnote 14	Sony

1	Opposition, Ex. 1 (RX2064)	Entire document	Sony
2	Opposition, Ex. 10 (RX4021 – Ryan Dep. Vol. I Tr.)	Entire document	Sony
3	Opposition, Ex. 13 (RX4050 – Svensson Dep. Tr.)	Entire document	Sony
4	Opposition, Ex. 14	Entire document	Sony
5	Opposition, Ex. 17 (RX2010)	Entire document	Sony
6	Opposition, Ex. 18 (RX2026)	Entire document	Sony
7	Opposition, Ex. 19 (RX2023)	Entire document	Sony
8	Opposition, Ex. 20 (RX2024)	Entire document	Sony
9	Opposition, Ex. 21 (RX2034)	Entire document	Sony
10	Opposition, Ex. 22 (RX2098)	Entire document	Sony
11	Opposition, Ex. 23 (RX2013)	Entire document	Sony
12	Opposition, Ex. 46 (RX2069)	Entire document	Sony
13	Opposition, Ex. 47 (RX4055 – Prata Tr.)	Entire document	Nintendo
14	Opposition, Ex. 57 (RX2170)	Entire document	Sony

24 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of Defendants'
 25 Opposition and supporting materials accompany this Administrative Motion. In accordance with Civil
 26 Local Rule 7-11, Defendants also file a Proposed Order herewith.
 27
 28

1 Dated: June 17, 2023

Respectfully submitted,

2
3 By: /s/ Beth Wilkinson
4 Beth Wilkinson (*pro hac vice*)
5 Rakesh N. Kilaru (*pro hac vice*)
6 Kieran Gostin (*pro hac vice*)
7 Grace Hill (*pro hac vice*)
8 Anastasia M. Pastan (*pro hac vice*)
9 Sarah E. Neuman (*pro hac vice*)
10 Alysha Bohanon (*pro hac vice*)
11 Jenna Pavelec (*pro hac vice*)
12 WILKINSON STEKLOFF LLP
13 2001 M Street, N.W., 10th Floor
14 Washington, D.C. 20036
15 Telephone: (202) 847-4000
16 Facsimile: (202) 847-4005
17 bwilkinson@wilkinsonstekloff.com
18 rkilaru@wilkinsonstekloff.com
19 kgostin@wilkinsonstekloff.com
20 ghill@wilkinsonstekloff.com
21 apastan@wilkinsonstekloff.com
22 sneuman@wilkinsonstekloff.com
23 abohanon@wilkinsonstekloff.com
24 jpavelec@wilkinsonstekloff.com

25
26
27
28 *Counsel for Microsoft Corporation*